

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



Office of Pesticide Programs

**MEMORANDUM**

3/17/2021

**SUBJECT:** Acute Toxicity Review for *Biocide ADBAC 80*,  
EPA Reg. No.: 90924-RT

**FROM:** Ian Blackwell, M.S., Biologist  
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**THRU:** Jenny Tao, Senior Scientist (Acute Toxicology)  
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03/17/2021

**TO:** Eric Miederhoff, PM Team 31 / Karen Leavy  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

|  |                           |                 |
|--|---------------------------|-----------------|
| Registrant: ChampionX, LLC                         |                           |                 |
| Case No.: 00219932                                 | Parent Case No.: 00154274 | E-Sub No.: none |
| DP No.: 458184                                     | Action Code: A565         |                 |
| MRID No(s): 45109202 – 4519204, 44885201, 51027503 |                           |                 |

| Formulation from label |            |  |           |
|------------------------|------------|--|-----------|
| PC code(s)             | CAS #(s)   | Active Ingredient(s)                             | % weight  |
| 069105                 | 68424-85-1 | Alkyl* Dimethyl Benzyl Ammonium Chloride (ADBAC) | 80        |
|                        |            | Other Ingredients                                | <u>20</u> |
|                        |            | Total  | 100       |

## I) BACKGROUND

The registrant, ChampionX, LLC, has submitted an application for pesticide registration for their product: *Biocide ADBAC 80*, EPA File Symbol 90924-RT. To support the acute toxicity requirements of this product, the registrant is citing MRID Numbers 45109202 – 4519204, 44885201 and 51027503.

This product is made for manufacturing-use. Users of this product will formulate it into end-use antimicrobial products.

## II) FINDINGS

- 1) MRID number 51027503: This is a request for the waiver of the primary eye irritation study of *Biocide ADBAC 80*, EPA File Symbol 90924-RT.
- 2) MRID Numbers 45109202 – 4519204 and 44885201: The other five acute toxicity studies cited were originally submitted and reviewed in support of EPA Reg. No. 3377-45 on 7/11/2000.
- 3) The Agency has conducted a comparison of the chemical formulations of EPA File Symbol 90924-RT and EPA Reg. No. 3377-45, and, finds the two products to be Substantially Similar in terms of acute toxicity.

## III) RECOMMENDATIONS:

- 1) The Agency waives the requirement of the primary eye irritation study based upon the acute toxicity classification of the primary skin irritation study. Also, the Agency document *Product Reregistration Batching Guidance for Quaternary Ammonium Compounds (Cases 0350 and 3003) – Acute Mammalian Toxicity Data Requirements*, 2/9/2015, states, “Registrants with a product containing greater than 0.50% total quat (per Appendix I) may accept a category I primary eye and skin irritation classification in place of citing or submitting eye and skin irritation data.” As this product contains far more than 0.50% total quaternary ammonium compound (ADBAC in this case), it meets this guidance criteria.
- 2) The Agency will allow the registrant’s intention of citing the 7/11/2000 acute toxicity review of EPA Reg. No. 3377-45 in support of the acute toxicity data requirements of EPA File Symbol 90924-RT.

- 3) The acute toxicity profile of *Biocide ADBAC 80*, EPA File Symbol 90924-RT, is currently:

| Study                     | MRID     | Toxicity Category | Status |
|---------------------------|----------|-------------------|--------|
| Acute Oral Toxicity       | 45109204 | II                | Cited  |
| Acute Dermal Toxicity     | 45109202 | II                | Cited  |
| Acute Inhalation Toxicity | 44885201 | II                | Cited  |
| Primary Eye Irritation    | 51027503 | I                 | Waived |
| Primary Skin Irritation   | 45109201 | I                 | Cited  |
| Dermal Sensitization      | 45109203 | Nonsensitizer     | Cited  |

**Conclusion:** The acute toxicity data requirements have been satisfied to support the registration of EPA File Symbol 90924-RT.

#### IV) PRODUCT LABELING

- 1) The Signal Word is "DANGER".
- 2) The statement, "Keep Out of Reach of Children (KOROC)", is required. It should appear immediately above the front-panel signal word "DANGER".
- 3) The Agency's Label Review Manual (<https://www.epa.gov/pesticide-registration/label-review-manual>) indicates the following human-hazard precautionary statements and the Spanish statement must appear as follows:

"Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)"

#### 4) PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

"DANGER. CORROSIVE. Causes irreversible eye damage and skin burns. May be fatal if swallowed, inhaled, or, absorbed through skin. Do not get in eyes, on skin or on clothing. Do not breathe vapor. Wear goggles, face shield or safety glasses. Wear coveralls over long-sleeved shirt and long pants, socks, shoes, chemical-resistant gloves (Barrier Laminate, Butyl Rubber, Nitrile Rubber, Neoprene Rubber, Natural Rubber, Polyethylene, Polyvinyl Chloride (PVC), or Viton), and chemical-resistant apron when handling. Wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with any N , R, or P

filter; OR a NIOSH approved elastomeric particulate respirator with any N , R, or P filter; ; OR a NIOSH-approved powered air purifying respirator with HE filters. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using restroom. Remove and wash contaminated clothing before reuse.”

5) The First Aid statements must state:

If in Eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a Poison Control Center or doctor for treatment advice.

If on Skin or Clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a Poison Control Center or doctor for treatment advice.

If Inhaled:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a Poison Control Center or doctor for treatment advice.

If Swallowed:

- Call a Poison Control Center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a Poison Control Center or doctor.
- Do not give anything by mouth to an unconscious person.

“Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.”

“Have product container or label with you when calling a Poison Control Center or doctor for treatment advice.”

“For general information on product use, etc., call the National Pesticides Information Center (NPIC) at 1-800-858-7378, 8:00 am – 12:00 pm Pacific Time, Monday – Friday; email: [npic@ace.orst.edu](mailto:npic@ace.orst.edu); or website: <http://npic.orst.edu/>. You may also contact the poison control center at 1-800-222-1222 for emergency medical treatment information.”

- 6) This product meets the Agency requirements for Restricted-Use Classification based on data that place it in toxicity category I for primary eye and skin irritation.
- 7) Based upon data placing it in toxicity category I for primary eye and skin irritation, this product meets the Agency requirements for Child-Resistant Packaging (CRP).